



HAWAII STATE ETHICS COMMISSION

Komikina Ho'opono Kulekele o Hawaii'i Moku'aina

NOTICE OF VIOLATION AND ORDER

TO (RESPONDENT): A. Bernard Bays	CASE No. REQ-2026-0551
ADDRESS: 733 Bishop Street, Suite 1900 Honolulu, HI 96813	RE: Prohibited Campaign Contribution on March 4, 2026

This Notice of Violation and Order (“Notice and Order”) is an administrative enforcement action initiated by the Hawaii State Ethics Commission (“Commission”) pursuant to Hawaii Revised Statutes (“Haw. Rev. Stat.”) Chapters 97 and 91, and Hawaii Administrative Rules (“HAR”) Title 21, in accordance with the Commission’s authority to investigate and adjudicate violations of the State Ethics Code.

This Notice and Order is issued to you for alleged violations of the State Ethics Code described below.

NOTICE OF VIOLATION

On March 4, 2026, during the 2026 legislative session, you made an online campaign contribution to the Friends of Derek Turbin candidate committee via the ActBlue platform.

Under Haw. Rev. Stat. § 97-5, during any legislative session and during the five days before and after the session, lobbyists are prohibited from making or promising to make a campaign contribution.

You represented that you were not aware that the law applied to contributions to non-incumbent candidates, and that you received a full refund of your contribution from the candidate committee. We appreciate your explanation and remedial action, as well as your assistance with this matter.

ORDER

RESPONDENT IS HEREBY ORDERED TO PAY THE FOLLOWING ADMINISTRATIVE PENALTY:

Count	Law Section	Description	Fine
1	97-5	<i>Lobbyist making contribution to candidate committee during the period encompassing a legislative session and five calendar days before and after the session</i>	\$250.00
		Total Administrative Penalty	\$250.00

This Notice of Violation and Order will become final and enforceable, and the administrative penalty specified above will become due and payable twenty (20) days after your receipt of it, unless you submit a written request for a contested case hearing as described in the "REQUEST FOR HEARING" section below.

Payment shall be made by check or money order made payable to the "State of Hawai'i," and must reference the case number. Payment shall be mailed to:

Hawai'i State Ethics Commission
1001 Bishop Street, Suite 970
Honolulu, Hawai'i 96813

Upon receipt of full payment, the Commission will publish this Notice and Order on its website and indicate that this matter has been closed due to payment of the administrative penalty.

REQUEST FOR HEARING:

This Notice and Order becomes final and enforceable, and the penalty becomes due and payable twenty (20) days after your receipt of it, unless you submit a written request for a hearing to the:

Executive Director
Hawai'i State Ethics Commission
1001 Bishop Street, Suite 970
Honolulu, Hawai'i, 96813

This hearing will be limited to determining whether your conduct on March 4, 2026, violated the Lobbyists law under Haw. Rev. Stat. § 97-5. Any defenses or justifications unrelated to the facts and issues outlined in this Notice will be considered outside the scope of the hearing.

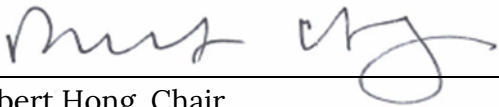
Any Request for Hearing must include:

- (1) A reference to the relevant case number and your name.
- (2) A concise summary of the arguments you intend to make at the hearing.
- (3) A copy of any evidence you intend to rely on at the hearing.
- (4) The names and contact information of any witnesses you intend to call at the hearing.
- (5) A summary description of the testimony you intend to introduce from each witness you intend to call.
- (6) The anticipated amount of time you intend to examine each witness.

The hearing will be conducted in accordance with Hawai'i Revised Statutes chapters 97 and 91, and title 21, Chapter 5 of the Hawai'i Administrative Rules. Pursuant to Haw. Under Rev. Stat. § 91-9(c), the hearing may be held via Zoom or other remote hearing technology at a time to be announced by the Commission after the Commission reviews your request for a hearing.

If you do not request a hearing in accordance with the instructions above within twenty days of receipt of this Notice and Order, this Order will become final and enforceable, and you will owe the administrative penalty above. If you do not pay the administrative penalty, the Commission may refer this matter to the Attorney General's office for collection proceedings.

Dated: Honolulu, Hawai'i, May 20, 2026.



Robert Hong, Chair